

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

	X
In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA
as representative of	: Title III
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	: Case No. 17-BK-3283 (LTS)
Debtors. ¹	: (Jointly Administered)
	:
	X
In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA
as representative of	: Title III
PUERTO RICO ELECTRIC POWER AUTHORITY	: Case No. 17-BK-4780 (LTS)
Debtor.	: This filing relates only to : Case No. 17-BK-4780 (LTS)
	:
	X

**[PROPOSED] ORDER GRANTING OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' OMNIBUS MOTION TO COMPEL PRODUCTION OF DOCUMENTS
IN CONNECTION WITH PREPA RSA RULE 9019 SETTLEMENT MOTION**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Official Committee Of Unsecured Creditors' Omnibus Motion To Compel Production Of Documents In Connection With PREPA RSA Rule 9019 Settlement Motion* (the “Motion”), the Court having reviewed the Motion and the relief requested; the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1331 and 48 U.S.C. § 2166(a); the Court determining that venue of this proceeding and the Motion in this District is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); notice of the Motion being adequate and proper under the circumstances; and after due deliberation and sufficient cause appearing; therefore, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. It is hereby ORDERED that the Government Parties in responding to the Committee’s requests are not entitled to assert a deliberative process privilege over any documents or communications concerning the Government Parties’ negotiation of and/or ultimate agreement to the RSA.
3. It is hereby ORDERED that the Government Parties, the Ad Hoc Group, and Assured in responding to the Committee’s request are not entitled to assert a common interest privilege over documents or communications dated prior to the May 3, 2019 execution of the Definitive RSA.
4. It is hereby ORDERED that AAFAF and PREPA add the following individuals as document custodians: (1) Eli Atienza Diaz, (2) Jose Ortiz, and (3) Nelson Morales.
5. It is hereby ORDERED that Filsinger identify a set of relevant document custodians and conduct its own search for responsive documents and communications.

6. It is hereby ORDERED that FOMB add the following individuals as document custodians: (1) Jose B. Carrion III; (2) Andrew Biggs; (3) Carlos M. Garcia; (4) Arthur J. Gonzalez; (5) Ana J. Matosantos; (6) Jose R. Gonzalez; and (7) David A. Skeel.

7. It is hereby ORDERED that Citi add the following individuals as document custodians: (1) Frederic Chapados; (2) Thomas Green; (3) John Gavin; (4) Sandip Sen; and (5) Mariah Shones.

8. It is hereby ORDERED that the three Ad Hoc Group member funds with the largest PREPA holdings:

- a. identify the team with primary responsibility for negotiations relating to the PREPA settlement, and from the members of that team, produce all communications relating to (a) the RSA, Preliminary RSA, or the Settlement, with respect to each including all negotiations, prior versions and drafts thereto, and (b) such fund's collateral position; and
- b. produce documents relating to its PREPA positions maintained in the ordinary course of business from January 1, 2018 to the present by its credit committee (or similar body).

9. It is hereby ORDERED that the Nonproducing Parties search for and produce (1) hard copy documents, and (2) non-email electronic communications (including but not limited to text messages, instant messages, WhatsApp messages, and any similar forms of communications) in response to the Committee's document requests.

10. It is hereby ORDERED that, in addition to the productions to which the Nonproducing Parties have agreed in their Responses and Objections and subsequent meet-and-confer discussions with the Committee, the Nonproducing Parties shall provide complete

productions of responsive, non-privileged documents in response to the following

Committee's requests for discovery, as follows:

- a. FOMB – Requests Nos. 4, 5, 8, 9, 12, 17, 18, 19, 20, 25 and 26.
- b. AAFAF – Requests Nos. 4, 5, 9, 10, 11, 12, 17, 18, 19, 20, 25 and 26.
- c. PREPA - Requests Nos. 4, 5, 9, 10, 11, 12, 17, 18, 19, 20, 25 and 26.

11. It is hereby ORDERED that Assured produce loss reserve calculations and communications relating to such loss reserve calculations shared with New York regulators.

12. It is hereby ORDERED that all documents produced by FOMB, AAFAF, and PREPA in connection with the Renewed Receiver Motion be deemed produced in response to the Committee's document requests relating to the 9019 Motion.

13. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this order.

Dated: _____
Boston, Massachusetts

Hon. Judith G. Dein
UNITED STATES MAGISTRATE JUDGE